

EXHIBIT F

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: JUUL LABS, INC., MARKETING,
SALES PRACTICES, AND PRODUCTS
LIABILITY LITIGATION

Case No. 19-md-02913-WHO

**DEFENDANTS’
FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS TO
PLAINTIFFS WALKER MCKNIGHT,
DAVID MCKNIGHT, AND CANDACE
MCKNIGHT**

This Document Relates to:

*Walker McKnight et al. v. JUUL Labs, Inc., et
al.*, Case No. 20-cv-02600-WHO

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendants, through undersigned counsel, propound the following First Set of Requests for Production of Documents to Plaintiffs Walker McKnight, David McKnight, and Candace McKnight. Responses to these Requests for Production, or objections in lieu thereof, shall be served within 14 days after service of this document. Defendants expressly reserve the right to serve additional document requests at a later time.

DEFINITIONS

1
2 1. “Action” means *Walker McKnight et al. v. Juul Labs, Inc., et al.*, Case No. 20-cv-
3 02600-WHO.

4 2. “Cannabis” or “Cannabis Products” means any product, including but not limited to
5 smoking, vaping, or food products, containing tetrahydrocannabinol or cannabidiol.

6 3. “Communication” or “Communications” means any written or oral disclosure,
7 transfer, or exchange of information, data, or opinion, however made, and shall mean, but is not
8 limited to, any transmittal and/or receipt of information, whether such was formal or informal, and
9 specifically include conversations in person, telephone conversations, letters, memoranda,
10 electronic mail, and social media posts or messages.

11 4. The terms “Concern” or “Concerning,” in addition to their natural meaning, shall
12 also mean reflecting, constituting, containing, pertaining, supporting, referring, indicating,
13 showing, evidencing, describing, discussing, mentioning, bearing upon, comprising, and relating.

14 5. “Defendants” shall be construed to include JLI, Altria Group, Inc., Philip Morris
15 USA, Inc., Altria Client Services LLC, Altria Distribution Company, and Altria Enterprises LLC,
16 Adam Bowen, Nicholas Pritzker, Riaz Valani, Hoyoung Huh, James Monsees, Mother Murphy’s
17 Laboratories Inc., Alternative Ingredients, Inc, eLiquitech, Inc, Tobacco Technologies, Inc.,
18 Chevron Corp., Eby-Brown Company, LLC, Core-Mark Holding Company, Inc., 7-Eleven, Inc.,
19 and Wawa, Inc.

20 6. “Document” or “Documents” shall be construed to the fullest extent permitted
21 under the Federal Rules of Civil Procedure and is used in the broadest sense, meaning all written,
22 printed, typed, recorded or graphic matter, however produced or reproduced, of every kind and
23 description, in whatever form (e.g., final and draft versions) in Your actual or constructive
24 possession, custody, care, or control, including but not limited to all writings, correspondence,
25 emails, letters, notes, agendas, memoranda, inter-office Communications, reports, projects,
26 analyses, working papers, charts, debit or credit card or bank account statements, receipts,
27 calendars, appointment books, diaries, journals, drawings, graphs, photographs, notes of telephone
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1 conversations or meetings, extracts or summaries of other Documents, computer files, computer
2 printouts, data stored on computer storage disks, hard drives, or networks, social media posts or
3 communications, videos, data compilations from which information can be obtained or can be
4 translated through detection devices into reasonably useable form, or any other tangible thing. The
5 term “Document” or “Documents” shall include not only originals but also any copies or
6 reproductions of all such written, printed, typed, recorded, or graphic matter upon which notations
7 in writing, print, or otherwise have been made that do not appear in the originals. In addition to the
8 items in the foregoing list, any comment, notation, strike-out, interlineation, or other alterations
9 appearing on any Document or any copy of any Document, and not a part of the original text of
10 such Document, is considered a separate Document, as is any draft or preliminary form of any
11 Document.

12 7. “ENDS” or “ENDS Products” shall mean any electronic nicotine delivery system,
13 including but not limited to e-cigarettes, personal vaporizers, vape pens, e-cigars, e-hookahs,
14 vaping devices, mod systems, nicotine e-liquids or pod systems, or any other product that heats a
15 composition to produce an aerosol that contains nicotine that is inhaled by the user.

16 8. The terms “Identify” or “Identifying,” when used as to a Person or entity, means to
17 state their full name, address, date of birth, and telephone numbers; when used in reference to a
18 documents means to provide the Bates number associated with it or, if no Bates number is
19 applicable, to state whether such document exists, the name and a detailed description of the
20 document’s contents, the date of the document, and the current custodian and location of the
21 document; when used in reference to a location means to state the address of the location and, if
22 applicable, the name of the location; otherwise means to provide information that specifically
23 identifies the information or item requested; and/or means to provide any other specific
24 information requested.

25 9. “Illegal Drug” or “Illegal Drugs” shall mean any illicit drug in the United States,
26 including, but not limited to cocaine, crack, inhalants, hallucinogens, heroin, methamphetamine,
27 or prescription-type drugs used non-medically.

1 10. The terms “Include,” “Includes,” and “Including” mean “including but not limited
2 to” or “including without limitation.”

3 11. “JLI” shall mean Defendant Juul Labs, Inc., as well as any parent, affiliate,
4 subsidiary or business segment, predecessor, successor or assignee, principal, operating division,
5 present or former owners, employees, officers, directors, agents, representatives, attorneys,
6 accountants, distributors, and any other Person acting on behalf of or under the direction,
7 authorization, or control of JLI.

8 12. “JUUL Product” or “JUUL Products” means any ENDS Product manufactured,
9 designed, advertised, sold, or distributed by JLI, including JUUL devices and JUUL pods.

10 13. “Non-JLI Defendants” shall be construed to include all Defendants except for JLI.

11 14. “Person” or “Persons” includes any natural person, custodian of records, firm,
12 association, partnership, joint venture, corporation, related or associated company, trust, or other
13 form of legal entity.

14 15. “Tobacco Product” or “Tobacco Products” refers to any product made or derived
15 from tobacco that is intended for human consumption, including any component, part, or
16 accessory of a Tobacco Product (except for raw materials other than tobacco used in
17 manufacturing a component, part, or accessory of a tobacco product).

18 16. “You,” “Your,” and “Plaintiffs” shall mean the Plaintiffs in the Action and each of
19 his or her employees, agents, present and former attorneys, and any other Person acting on his or
20 her behalf, including guardians.

21 17. As used herein, the singular shall include the plural and the present tense shall
22 include the past tense. The words “and” and “or” shall be construed disjunctively or conjunctively
23 as necessary to bring within the scope of a Request all documents or things that might otherwise
24 be construed to be outside its scope. The use of the term “the” shall not be construed as limiting
25 the scope of any Request.

26 18. In keeping with the Court’s Order Re: Discovery of Electronically Stored
27 Information, Dkt. No. 323, all technical terms shall follow or be defined by *The Sedona*
28 *Conference Glossary: E- Discovery and Digital Information Management*.

INSTRUCTIONS

1. If any Document responsive to these Requests was, but no longer is, in Your possession, or subject to Your custody or control, or in existence, state in writing whether: (a) it is missing or lost; (b) it has been destroyed; (c) it has been transferred voluntarily or involuntarily to others; or (d) it has been disposed of otherwise. In each instance, explain the circumstances surrounding such disposition and identify the Person(s) directing or authorizing the same and the date(s) thereof. Identify each Document by listing its author, his or her address, type (e.g., letter, memorandum, telegram, chart, photograph), date, subject matter, present location(s) and custodian(s), and state whether the Document (or a copy) is still in existence.

2. If You claim that any Document requested is protected by the attorney-client privilege, the work product doctrine, or any other privilege, the protocol outlined in Case Management Order No. 4: 502(D) and Privileged Materials Order is applicable, including any privilege log obligations.

3. These Requests for Production are continuing requests. If, after producing the requested Documents, You obtain or become aware of any additional Documents responsive to these Requests for Production, You are required to produce such additional Documents.

REQUESTS FOR PRODUCTION

REQUEST NO. 1

All Documents and Communications consulted in completing or identified in Your Plaintiff Fact Sheet.

REQUEST NO. 2

All Documents and Communications consulted in completing or identified in Your April 3, 2024, Declaration in this Action.

REQUEST NO. 3

All Communications Concerning Walker McKnight's alleged JUUL Product use, ENDS Product use, Tobacco Product use, other inhaled product use (Including inhaled Cannabis Products), alcohol use, Illegal Drug use, or illicit use of legal drugs, Your alleged damages, or Your allegations in the Action.

1 **REQUEST NO. 4**

2 All photographs, films, movies, or video recordings of Walker McKnight using Tobacco
3 Products, ENDS Products, JUUL Products, other inhaled products (Including inhaled Cannabis
4 Products), alcohol, Illegal Drugs, or legal drugs illicitly.

5 **REQUEST NO. 5**

6 All Documents reflecting the basis of Your allegations against each Non-JLI Defendant,
7 including Documents sufficient to identify each of Your interactions with each of the Non-JLI
8 Defendants.

1 Dated: May 13, 2024

Respectfully submitted,

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